



NOV 1 2 2014

Mr. Gilbert Rodriguez JR Simplot Company PO Box 128 Helm, CA 93627-0128

Re: Notice of Minor Title V Permit Modification

District Facility # C-705 Project # C-1142853

Dear Mr. Rodriguez:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued C-705-3-16 into the Title V operating permit. The ATC authorizes the replacement of the nitric acid plant's steam turbine assembly.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-705-3-16, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely.

Arnaud Marjollet

Director of Permit Services

**Enclosures** 

Gerardo C. Rios, EPA (w/enclosure) via email CC:

> Seyed Sadredin Executive Director/Air Pollution Control Officer

### **TITLE V APPLICATION REVIEW**

Minor Modification Project #: C-1142853

Engineer: Jesse A. Garcia
Date: November 10, 2014

Facility Number: C-705

Facility Name: JR Simplot Company

Mailing Address: PO Box 128

Helm, CA 93627-0128

Contact Name: Gilbert Rodriguez

Phone: (559) 392-6902

Responsible Official: Gilbert Rodriquez

Title: Production Manager

### I. PROPOSAL

JR Simplot Company is proposing a Title V minor permit modification to incorporate the recently issued ATC C-705-3-16 into the Title V operating permit. The ATC authorizes the replacement of the nitric acid plant's steam turbine assembly.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

### II. FACILITY LOCATION

The facility is located at 12688 S. Colorado Avenue in Helm, CA.

### III. EQUIPMENT DESCRIPTION

C-705-3-17: NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH3 TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS PREHEATER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO3 ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO2 TO N2 BUTANE FIRED

COMBUSTOR FOR EMISSIONS, 4 NITRIC ACID STORAGE TANKS, TRUCK LOADING STATION, DRIP PAD SUMPS AND SCRUBBER

### IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

### V. APPLICABLE REQUIREMENTS

District Rule 2520, <u>Federally Mandated Operating Permits</u> (Adopted June 21, 2001)

### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The purpose of the ATC project is to replace the steam turbine assembly. The proposed permit and the current permit have no differences in permit conditions because the proposed steam turbine assembly will operate similar to the current steam turbine assembly.

There are no emissions increase associated with the project because the proposed modification does not affect throughput or emissions from the process.

### VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

- 1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
- 2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions:
- 3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
- 4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
  - A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and

- An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
- Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
- 6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including:

- 1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- 2. The source's suggested draft permit; and
- 3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

### VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. C-705-3-17
- B. Authority to Construct No. C-705-3-16
- C. Application
- D. Previous Title V Operating Permit No. C-705-3-15

# **ATTACHMENT A**

Proposed Modified Title V Operating Permit No. (C-705-3-17)

## San Joaquin Valley Air Pollution Control District

**PERMIT UNIT: C-705-3-17** 

### **EQUIPMENT DESCRIPTION:**

NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE WHY TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS PREHEATER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO3 ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO2 TO N2 BUTANE FIRED COMBUSTOR FOR EMISSIONS, 4 NITRIC ACID STORAGE TANKS, TRUCK LOADING STATION, DRIP PAD SUMPS AND SCRUBBER

## PERMIT UNIT REQUIREMENTS

- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- NO2 emissions shall not exceed 180 ppm three-hour average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2. [District Rules 1080 and 2201, 40 CFR 60.72 (a), and 40 CFR 60.73] Federally Enforceable Through Title V Permit
- When the plant is operating, the monitors shall be inspected for zero drift and span drift per 40 CFR 60.13d. Reanalyze zero and span gases per 40 CFR 60.13d (July 1, 1977). [40 CFR 60.13 (d) and 60.73 (a)] Federally Enforceable Through Title V Permit
- Permittee shall record daily production rate and emission data. Records shall be retained and provided to the District upon request. [District Rule 2520 and 40 CFR 60.73 (c)] Federally Enforceable Through Title V Permit
- Permittee shall submit quarterly reports to the District and EPA, Region IX, no later than 30 days following the end of each calendar quarter, on excess emissions and monitor failures. The periods of excess emissions shall be defined in accordance with 40 CFR 60.73 (e). The report shall comply with all of the requirements of the District rules. [40 CFR 60.73 (e) and District Rule 1080] Federally Enforceable Through Title V Permit
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rule 406 (Fresno) and District Rule 4801] Federally Enforceable Through Title V Permit
- Except during periods of startup, shutdown, and malfunction, any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a) and 40 CFR 60.11 (c)] Federally Enforceable Through Title V Permit
- The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (lb/ton of 100% HNO3 produced). The conversion factor shall be obtained according to procedures and methods specified in 40 CFR 60.73 (b) and shall be reestablished during any performance test under 40 CFR 60.8 or any continuous emission monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)] Federally Enforceable Through Title V Permit
- 10. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part or the Facility-wide Permit to Operate.

Facility Name: J R SIMPLOT COMPANY Location: 12688 S COLORADO AVE, HELM, CA 93627 C-705-3-17: Nov 10 2014 11:34AM - GARCIAJ

- 11. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 1 hour after the breakdown is detected. [District Rule 1080] Federally Enforceable Through Title V Permit
- 12. The continuous NOx monitor shall meet the applicable performance specification requirements in 40 CFR Part 51, Appendix P, and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 13. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
- 14. Records of inspection shall be maintained, kept, and made available to the District upon request. The record shall at least include equipment description, date and time of inspection, any corrective action taken, and identification of the individual performing an inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

of the Facility-wide Permit to Operate.

Facility Name: J R SIMPLOT COMPANY Location: 12688 S COLORADO AVE, HELM, CA 93627 C-7053-17 Nov 10 2014 11:34AM - GARCIAU

# ATTACHMENT B

Authority to Construct No. (C-705-3-16)





## **AUTHORITY TO CONSTRUCT**

PERMIT NO: C-705-3-16

**ISSUANCE DATE: 08/29/2014** 

LEGAL OWNER OR OPERATOR: JR SIMPLOT COMPANY

MAILING ADDRESS:

RT 1100-0023 PO BOX 9168

BOISE, ID 83707

LOCATION:

12688 S COLORADO AVE

HELM, CA 93627

#### **EQUIPMENT DESCRIPTION:**

MODIFICATION OF NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH3 TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS PREHEATER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO3 ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO2 TO N2 BUTANE FIRED COMBUSTOR FOR EMISSIONS, 4 NITRIC ACID STORAGE TANKS, TRUCK LOADING STATION, DRIP PAD SUMPS AND SCRUBBER: ROUTINE REPLACEMENT OF NITRIC ACID PLANT STEAM TURBINE ASSEMBLY

### **CONDITIONS**

- The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
- Authority to Construct (ATC) C-705-3-15 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- NO2 emissions shall not exceed 180 ppm three-hour average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2. [District Rules 1080 and 2201, 40 CFR 60.72 (a), and 40 CFR 60.73] Federally Enforceable Through Title V Permit
- When the plant is operating, the monitors shall be inspected for zero drift and span drift per 40 CFR 60.13d. Reanalyze zero and span gases per 40 CFR 60.13d (July 1, 1977). [40 CFR 60.13 (d) and 60.73 (a)] Federally Enforceable Through Title V Permit

### CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjotlet, Director of Permit Services

- 6. Permittee shall record daily production rate and emission data. Records shall be retained and provided to the District upon request. [District Rule 2520 and 40 CFR 60.73 (c)] Federally Enforceable Through Title V Permit
- 7. Permittee shall submit quarterly reports to the District and EPA, Region IX, no later than 30 days following the end of each calendar quarter, on excess emissions and monitor failures. The periods of excess emissions shall be defined in accordance with 40 CFR 60.73 (e). The report shall comply with all of the requirements of the District rules. [40 CFR 60.73 (e) and District Rule 1080] Federally Enforceable Through Title V Permit
- 8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15
  consecutive minutes. [County Rule 406 (Fresno) and District Rule 4801] Federally Enforceable Through Title V
  Permit
- 10. Except during periods of startup, shutdown, and malfunction, any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a) and 40 CFR 60.11 (c)] Federally Enforceable Through Title V Permit
- 11. The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (lb/ton of 100% HNO3 produced). The conversion factor shall be obtained according to procedures and methods specified in 40 CFR 60.73 (b) and shall be reestablished during any performance test under 40 CFR 60.8 or any continuous emission monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)] Federally Enforceable Through Title V Permit
- 12. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080] Federally Enforceable Through Title V Permit
- 13. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 1 hour after the breakdown is detected. [District Rule 1080] Federally Enforceable Through Title V Permit
- 14. The continuous NOx monitor shall meet the applicable performance specification requirements in 40 CFR Part 51, Appendix P, and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 15. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
- 16. Records of inspection shall be maintained, kept, and made available to the District upon request. The record shall at least include equipment description, date and time of inspection, any corrective action taken, and identification of the individual performing an inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

# ATTACHMENT C

**Application** 



[ ] ADMINISTRATIVE AMENDMENT

# San Joaquin Valley Air Pollution Contro Restrict VE

www.valleyair.org

NOV 0 5 2014

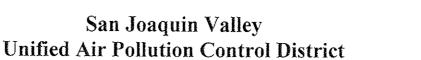
## Permit Application For:

[X] MINOR MODIFICATION

Permits Services
[] SIGNIFICANTION

1. PERMIT TO BE ISSUED TO:  JR SIM	PLOT COMPANY	
2. MAILING ADDRESS:	· · · · · · · · · · · · · · · · · · ·	
STREET/P.O. BOX: 12688 S COLORADO AVE / PO	O Box 128	
CITY: HELM	STATE: CA	9-DIGIT  ZIP CODE: 93627-0128
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:		INSTALLATION DATE:
STREET: 12688 S COLORADO AVE	CITY: HELM	
SE 4 SECTION 10 TOWNSH	HIP 16S RANGE 17E	
4. GENERAL NATURE OF BUSINESS:		
Nitrogenous Fertilizer Manufacturing		
necessary, please contact Gilbert Rodriguez :	at (559) 392-6902.	ermit to operate. If any additional information is
6. TYPE OR PRINT NAME OF APPLICANT: Gilbert Rodriguez	TITLE OF APPLICANT: Production Manager	
7. SIGNATURE OF APPLICANT:	DATE:	PHONE: (559) 392-6902
11-5-14		FAX: (559) 866-1507
sw of s		Gilbert.Rodriguez@ EMAIL: simplot.com
For APCD Use Only:		
DATE STAMP	FILING FEE RECEIVED : \$	CHECK#:
	DATE PAID:	
	PROJECT NO: C-1142	853 FACILITY ID: C - 705







## TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. 7	TYPE OF PERMIT ACTION (Check appropriate	te box)		
[ ] : [XX]	SIGNIFICANT PERMIT MODIFICATION [ ] MINOR PERMIT MODIFICATION	ADMINISTRATIVE AMENDMENT		
1	MPANY NAME: JR Simplot Co.		FACILITY ID: C = 705	
1. T	Type of Organization: $[X]$ Corporation $[\ ]$ Sole Ownership	o []Government []F	artnership [] Utility	
2. C	Owner's Name: JR Simplot Co.			
3. A	Agent to the Owner: Gilbert Rodriguez			
II. C	COMPLIANCE CERTIFICATION (Read each statement	nt carefully and initial all	circles for confirmation):	
(	Based on information and belief formed after reasona continue to comply with the applicable federal require	ble inquiry, the equipmen ement(s).	t identified in this application will	
(	Based on information and belief formed after reasonal comply with applicable federal requirement(s) that we	ble inquiry, the equipmen	t identified in this application will g the permit term, on a timely basis	
6	Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.			
(	Based on information and belief formed after reasona application package, including all accompanying reposition complete.	ble inquiry, information a orts, and required certifica	nd statements in the submitted tions are true accurate and	
I decl	clare, under penalty of perjury under the laws of the state of	California, that the forgo	ing is correct and true:	
_	-sell him	11-5	- 14	
Signa	nature of Responsible Official	Date		
G	rilbert Rodriguez			
Name	ne of Responsible Official (please print)			
<u>P,</u>	Production Manager			
Title	e of Responsible Official (please print)			

# ATTACHMENT E

Previous Title V Operating Permit No. C-705-3-15

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-3-15 EXPIRATION DATE: 11/30/2014

#### **EQUIPMENT DESCRIPTION:**

NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH3 TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS PREHEATER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO3 ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO2 TO N2 BUTANE FIRED COMBUSTOR FOR EMISSIONS, 4 NITRIC ACID STORAGE TANKS, TRUCK LOADING STATION, DRIP PAD SUMPS AND SCRUBBER

## **PERMIT UNIT REQUIREMENTS**

- 1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. NO2 emissions shall not exceed 180 ppm three-hour average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2. [District Rules 1080 and 2201, 40 CFR 60.72 (a), and 40 CFR 60.73] Federally Enforceable Through Title V Permit
- 3. When the plant is operating, the monitors shall be inspected for zero drift and span drift per 40 CFR 60.13d. Reanalyze zero and span gases per 40 CFR 60.13d (July 1, 1977). [40 CFR 60.13 (d) and 60.73 (a)] Federally Enforceable Through Title V Permit
- 4. Permittee shall record daily production rate and emission data. Records shall be retained and provided to the District upon request. [District Rule 2520 and 40 CFR 60.73 (c)] Federally Enforceable Through Title V Permit
- 5. Permittee shall submit quarterly reports to the District and EPA, Region IX, no later than 30 days following the end of each calendar quarter, on excess emissions and monitor failures. The periods of excess emissions shall be defined in accordance with 40 CFR 60.73 (e). The report shall comply with all of the requirements of the District rules. [40 CFR 60.73 (e) and District Rule 1080] Federally Enforceable Through Title V Permit
- 6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15
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  Permit
- 8. Except during periods of startup, shutdown, and malfunction, any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a) and 40 CFR 60.11 (c)] Federally Enforceable Through Title V Permit
- 9. The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (lb/ton of 100% HNO3 produced). The conversion factor shall be obtained according to procedures and methods specified in 40 CFR 60.73 (b) and shall be reestablished during any performance test under 40 CFR 60.8 or any continuous emission monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)] Federally Enforceable Through Title V Permit
- 10. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080] Federally Enforceable Through Title V Permit

- 11. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 1 hour after the breakdown is detected. [District Rule 1080] Federally Enforceable Through Title V Permit
- 12. The continuous NOx monitor shall meet the applicable performance specification requirements in 40 CFR Part 51, Appendix P, and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 13. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
- 14. Records of inspection shall be maintained, kept, and made available to the District upon request. The record shall at least include equipment description, date and time of inspection, any corrective action taken, and identification of the individual performing an inspection. [District Rule 2520] Federally Enforceable Through Title V Permit